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**COMMENTS:DRAFT TEST PAD REPORT**

**12/23/96**

**OEPA            DOE-FEMP**  
**3**  
**COMMENTS**



State of Ohio Environmental Protection Agency

Southwest District Office

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K-0587

DEC 23 9 22 AM '96

FILE: 10446.3

George V. Voinovich  
Governor

December 23, 1996

RE: DOE FEMP  
MSL 531-0297  
HAMILTON COUNTY  
COMMENTS: DRAFT TEST PAD  
REPORT

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

Dear Mr. Reising:

This letter provides as an attachment Ohio EPAs comments on the OSDF Test Pad Program Final Report received by Ohio EPA on November 27, 1997.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FERMCO  
Ruth Vandergrift, ODH  
Mike Proffitt, DD&GW  
Sharon McLellan, PRC  
Manager, TPSS/DERR,CO  
Dave Ward, GeoTrans  
DTPADREP.LTT

(WARNER (R))  
Partial Action  
RESPONSE  
TO DEC 15/16-97  
(1/13/98)

Ohio EPA comments  
Draft Test Pad Program Final Report, Rev B  
Page 2

Comment: Figure 9-1 appears to be mislabeled. It should say "Upper Horizon Brown Till Acceptable Permeability Zone (APZ)".

- 5) Commenting Organization: Ohio EPA                      Commentor: DERR  
Section #:                      Pg #:                      Line #:                      Code: e  
Original Comment #:  
Comment: Volume II, Appendix A is missing from my copy.
- 6) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 9.5                      Pg #: 9-5                      Line #: last sentence                      Code: e  
Original Comment #:  
Comment: The last sentence on this page which continues to the next page is incomplete.

## Ohio EPA comments "Draft Test Pad Program Final Report Revision B"

- 1) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: Pg #: Line #: Code: general  
 Original Comment #:  
 Comment: The performance of the test pad was consistent with the performance standards for recompacted clay liners as specified in the Ohio Administrative Code (OAC). However, the in situ materials in the Borrow Area fail to meet two different material specifications as listed in OAC 3745-27-08. These two specifications are:
- 3745-27-08(C)(1)(c)(i) 100% of soil having a maximum dimension not greater than two inches
  - 3745-27-08(C)(1)(c)(iv) not less than 25% of the particles having a maximum dimension not greater than 0.002 mm
- In Section 9.2 of the TPPFR, an alternative performance standard of not less than 15% of the particles having a maximum dimension not greater than 0.002 mm is reiterated. This alternate specification was first suggested by DOE in a letter dated January 26, 1996 and Ohio EPA has concurred with this concept. However, one of the samples from the lower brown till horizon could not meet the revised criterion, either. See Table 9-1. What procedures will be followed by the Construction Subcontractor to avoid using clays that fail to meet the new specification?
- In the case of the first bullet, the TPPFR suggests keeping the OAC specification unchanged and requiring the Construction Subcontractor to propose a method to remove outside particles (Section 9.3). The Ohio EPA approves of this approach, but notes that visual inspection will not achieve satisfactory results.
- 2) Commenting Organization: Ohio EPA Commentor: DERR  
 Section #: 3 Pg #: Figure 3.2 Line #: Code: c  
 Original Comment #:  
 Comment: Figure 3.2 Should the vertical axis legend be "Percent Smaller Than 0.002 mm"?
- 3) Commenting Organization: Ohio EPA Commentor: DERR  
 Section #: 3.5 Pg #: 3-12 Line #: Code: c  
 Original Comment #:  
 Comment: This paragraph should be modified to state that soil samples from a few of the borings had less than a 50 percent fraction passing the 200 mesh sieve (see Table 3-2 and Figure 3-3). While this apparently did not affect the final performance of the test pads, the specification should clearly state whether soils not meeting the 200 mesh sieve requirement are acceptable. The same issue needs to be addressed in the summary of Conformance Test Requirements of Section 9.6. The 200 mesh sieve requirement is an ARAR of OAC 3745-27-08 (C)(1)(c).
- 4) Commenting Organization: Ohio EPA Commentor: DERR  
 Section #: 9 Pg #: Figure 9-1 Line #: Code: c  
 Original Comment #: